

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

CASE NO.: 2:23-cv-01495-JHC

STIPULATED MOTION AND  
[PROPOSED] ORDER  
REGARDING PLAINTIFFS'  
MOTION TO ENTER AN ESI  
ORDER

NOTE ON MOTION CALENDAR:  
March 28, 2024

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed order set forth below, which replaces the Proposed Order for Plaintiffs' Motion to Enter an ESI Order (Dkt. #181, 182) with a Proposed Order that Amazon agrees does not need to be filed under seal:

In support of this request, the parties represent the following to the Court:

1. On March 22, 2024, Plaintiffs filed a Motion to Enter an ESI Order. Dkt. #181.
2. Amazon asserted confidentiality with respect to certain portions of the Proposed

Order for Plaintiffs' Motion to Enter an ESI Order. *See* Kennedy Decl. at ¶ 3,  
STIPULATED MOTION AND [PROPOSED] ORDER REGARDING PLAINTIFFS' MOTION TO ENTER AN ESI ORDER - 1  
CASE NO. 2:23-cv-01495-JHC

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Dkt. #180. Accordingly, Plaintiffs filed a Motion to Temporarily Seal the Proposed Order, Dkt. #179, and filed a redacted public version of the Proposed Order with their Motion to Enter an ESI Order, Dkt. #181-1.

3. The parties have agreed on a version of the Proposed Order, attached as **Exhibit A**, that Amazon agrees does not need to be filed under seal.
4. The parties stipulate as follows, subject to Court approval, and jointly request that the Court enter the following Order approving this stipulation:
  - a. The Proposed Order attached as **Exhibit A** is the Proposed Order for Plaintiffs' Motion to Enter an ESI Order, Dkt. #181.
  - b. Plaintiffs' Motion to Seal the Proposed Order for Plaintiffs' Motion to Enter an ESI Order, Dkt. #179, is moot.

Stipulated to and respectfully submitted this 28th day of March, 2024, by:

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**[PROPOSED] ORDER**

IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE

Presented By:

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